

In re)
) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
)
Debtor.) Hon. Steven W. Rhodes
)
)

Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in
Luxemburg S.A., Hypothekenbank Frankfurt AG, and Hypothekenbank Frankfurt International
S.A. (collectively “EEPK”), by their undersigned attorneys, and in compliance with this Court’s
*Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the
Debtor’s Plan of Adjustment* [Docket No. 5259], submit this amended list of fact witnesses and
identifies the subject(s) that each witness will address at the hearing on the City’s plan
confirmation hearing.

Name/Title	Topics
Simon Bowmer Director Head of Structured Credit Legacy Credit Portfolio Management	Mr. Bowmer may be called to testify regarding the 2005 and 2006 COPs transactions, and the amount of COPs held by EEPK.
Sonya Mays Senior Advisor to the Emergency Manager	Ms. Mays may be called to testify regarding the role of Conway MacKenzie in developing the restructuring and reinvestment initiatives.

Name/Title	Topics
Shani Penn Chief of Staff, Office of the Emergency Manager	Ms. Penn may be called to testify regarding the role of Conway MacKenzie in developing the restructuring and reinvestment initiatives.

2. Discovery is ongoing. Accordingly, EEPK reserves the right to add additional fact witnesses as discovery progresses.

3. EEPK reserves the right to call, as part of its case, any person listed on the witness list(s) filed by City or any creditor or party in interest, any person called by the City or any creditor or party in interest to testify at the plan confirmation hearing, and any other person for purposes of impeachment, as rebuttal to any testimony or evidence presented by the City, or and/or to lay foundation for any other witness' testimony or exhibits.

4. EEPK reserves the right to supplement the testimony topics associated with each witness listed above and to amend its witness list as may be necessary.

Dated: June 20, 2014.

Respectfully submitted,

/s/ Matthew G. Summers

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CERTIFICATE OF SERVICE

I, Matthew G. Summers, state that on June 20, 2014, I filed a copy of the foregoing EEPK's Amended List of Fact Witnesses with the Clerk of Court using the Court's ECF system and I hereby certify that the Court's ECF system has served all registered users that have appeared in the above-captioned case. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

/s/ Matthew G. Summers

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